



175 E. Old Country Road
Hicksville, New York 11801

March 31, 2003

Rebecca E. Kane
U.S. Environmental Protection Agency
Ariel Rios Building (MC: 2222A)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

RE: Comments of KeySpan Regarding EPA's Enforcement Compliance History Online

Dear Ms. Kane:

KeySpan is the largest investor owned electric generator in New York State, with over 6200 MW of generating capacity serving New York City and Long Island. KeySpan is also one of the largest natural gas distribution companies in the northeast, with facilities in New York, Massachusetts, New Hampshire, Vermont and Rhode Island.

After review of the ECHO web site, KeySpan does not agree that the web site currently provides meaningful and useful information concerning site compliance and enforcement. Much of the compliance data presented is questionable in its accuracy and completeness. Often non-compliances are noted even though the matter was resolved or the issue is under a consent order. There are often occurrences where multiple names for the same facility has appeared. In this situation an error report was filed but changes could only be made in the Facility Registry System (FRS) and not the other systems. Many of these other systems are administered by the State Authority and are beyond the scope of the error reporting function. A system with the design goals of ECHO requires a robust and integrated system. The fact that the various data systems do not seem to be up to date is evidence that there is not full integration as yet.

The question of the value of the information must also be addressed. Compliance with Federal and State programs is complex and cannot readily be distilled down to simple terms. This is evidenced by the nearly twenty page long data dictionary required to define terms and programs. The web site presents information that may be beyond the ability of the stakeholder to use in a meaningful way. The presentation is often not consistent from one facility to the next, making comparisons difficult. There is also no consistency regarding terms like 'significant' when addressing non-compliances, again making it difficult to make informed judgements about regulatory compliance.

Finally, KeySpan, being a Brooklyn, New York based company, is well aware of the current security climate and has gone to great lengths to increase security at our facilities. It is

troublesome that the ECHO web site provides instant access to latitude, longitude and demographic data regarding the facility and surrounding communities. The map feature provides detailed information on the location of the facility and its proximity to local street and highways and other types of facilities. This appears contrary and inconsistent with efforts to preserve homeland security. Access to sensitive information should be revisited and EPA should be consistent with other federal agencies on what information is deemed sensitive for the purposes of protecting homeland security.

Thank you for the opportunity to comment on the ECHO system.

Best regards,

Christopher Corrado
Manager, Air Quality Compliance
Environmental Engineering and Compliance